

APPENDIX

“A” – Deposition of Jocelyn Tobias;

“B” – Deposition of Jack Torres;

**“C” – Defendant’s Response to Plaintiffs’
Request for Admission Nos. 8&9;**

1 Q she said that she cannot give it to you because of
2 management's order?

3 A yes.

4 Q did she say anything after that?

5 A no.

6 Q did she say anything else?

7 A no.

8 Q did you ever ask anyone else at L&t for a copy of your
9 contract?

10 A no.

11 Q have you, um, ever applied any job, since you lost,
12 since your termination at L&T, have you applied for
13 any work outside of the cnmi?

14 A no.

15 Q have you applied for any work in the Philippines since
16 you were terminated by L&T?

17 A no.

18 Q did you expect to have your contract renewed, um, with
19 L&T for a second year?

20 A yes.

21 Q why?

22 A on my point of view I think positively I would say yes
23 because I myself is not, I worked, I believed that I
24 worked hard, not unless, ah, it's, ah, it depends on
25 the, oh, it depends on the employer because that is on

1 their hands if they're gonna renew you or not, because
2 as I've said some things changes without us, no, but
3 if you will ask me if I believe that I would be renew
4 I would positively say yes.

5 Q okay. And why would you believe that you would have a
6 renewal?

7 A why would I believe I would have a renewal, just, ah,
8 just, I just thought of it. I thought of it.

9 Q uh huh. Did anyone at L&T ever promise you that they
10 would renew your contract after one year?

11 A no, but, ah, I, I thought of it because they were
12 telling us the point that on the first, ah, on the
13 first year with regards to medical they said that we
14 will be shouldering, the second year for our renewal
15 they will be the ones to be,

16 Q shoulder?

17 A yes.

18 Q okay.

19 A be shouldering it or be taking it.

20 Q did someone tell you that?

21 A yes.

22 Q who, who told you that?

23 A the people from HR.

24 Q who, you don't know the name?

1 A Baby Lopez and, ah, the other lady, the one we
2 encounter on the window.

3 Q uh huh. So 2 different people told you that?

4 A yes.

5 Q okay. When did Baby Lopez tell you that?

6 A I don't remember anymore.

7 Q you don't, how do you remember that she told you?

8 A I, I knew that she told me that but I don't know the
9 exact dates anymore.

10 Q did she tell you that before you signed your contract,
11 employment contract?

12 A yes, before.

13 Q okay. Did she tell you that in person or over the
14 telephone?

15 A in person.

16 Q okay. So you met with Baby twice in person before you
17 signed your employment contract, is that right?

18 A it's not her but there's 2 of them as I said, they
19 alter.

20 Q did, do you remember Baby Lopez telling you that, um,
21 that you would be responsible for your health
22 certificate the first year and L&T would pay for it in
23 the second?

24 A yes, the other lady and Baby told that.

25 Q to you?